



May 3, 2018

Via Electronic Mail

Hon. Richard J. Sullivan
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007
sullivanysdchambers@nysd.uscourts.gov

Re: *Jeana K. Reinbold, as Chapter 7 Trustee of the Estate of Sandburg Mall Realty Management LLC v. Mehran Kohansieh, et al., 17-CV-06468 (RJS)*

Dear Judge Sullivan:

Jeana K. Reinbold, not individually but solely as Chapter 7 Trustee (the "Plaintiff") of the Estate of Sandburg Mall Realty Management, LLC and Defendants Mehran Kohansieh (a/k/a Mike Kohan and/or Mike Kohen d/b/a Kohan Retail Investment Group) ("Kohan"), Michael Khakshoor ("Michael"), Yousef Khakshoor ("Yousef") and North Park Realty Management, LLC ("North Park") (collectively, "Parties") submit this joint letter in response to the Court's Order, dated April 16, 2018 providing as follows:

ORDER: IT IS HEREBY ORDERED THAT, by May 3, 2018, the parties shall (1) provide the Court a copy of the settlement agreement and (2) submit a joint letter to the Court explaining why the settlement is fair, reasonable, and in the best interests of the estate, applying the criteria set forth in *In re Iridium Operating LLC*, 478 F.3d 452, 463 (2d Cir. 2007). IT IS FURTHER ORDERED THAT the parties shall provide the notice required by Rule 9019(a) and Rule 2002, as described above, by May 3, 2018. IT IS FURTHER ORDERED THAT the parties shall appear for a settlement approval hearing on May 25, 2018 at 3:30 p.m. IT IS FURTHER ORDERED THAT all other pending deadlines in this case are adjourned sine die, and as further set forth herein.

In accordance with Bankruptcy Rule 9019, the Plaintiff-Trustee is concurrently filing the Plaintiff-Trustee's Motion for an Order Approving Settlement Agreement Pursuant to Federal Rule of Bankruptcy Procedure 9019(a) ("Motion") with the Notice required by Rule 9019(a) and Rule 2002. Attached as Exhibit A to the Motion is a copy of the executed settlement agreement ("Settlement Agreement") between the parties.

The parties jointly adopt and request that the Court consider and approve the Settlement Agreement for the reasons set forth in the Motion.

Sincerely,

/s/ Patrick M. Jones

Jeana K. Reinbold, solely as Chapter 7 Trustee
of the Estate of Sandburg Mall Realty
Management, LLC

By: Patrick M. Jones
One of her attorneys

/s/ Thomas A. Farinella

Attorney for the Defendants Mehran
Kohansieh, Michael Khakshoor,
Youself Khakshoor and North Park
Realty Management, LLC

cc: Jeana K. Reinbold (via email)
Tracy Klestadt (via email)
Jeremy Berman (via email)